

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: MLCJR, LLC, Debtor. ¹	Chapter 11 Case No. 23-90324 (CML) (Motion for Joint Administration Pending)
In re: COX OPERATING, L.L.C., Debtor.	Chapter 11 Case No. 23-90327 (CML) (Motion for Joint Administration Pending)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that R&R Boats, Inc. and Specialty Offshore, Inc. (the “*Subject Petitioning Creditors*”), who, along with Keystone Chemical, LLC and Total Production Supply, LLC, are petitioning creditors in the bankruptcy case commenced on May 12, 2023 before Judge Meredith S. Grabill of the United States Bankruptcy Court for the Eastern District of Louisiana, case no. 23-10734 (the “*Prior Case*”), hereby appear through their counsel, Lugenbuhl, Wheaton, Peck, Rankin & Hubbard (“*Counsel*”). Counsel hereby enters appearance and requests that the undersigned be added to the official mailing matrix and service lists in the above-captioned cases. Counsel requests, pursuant to Bankruptcy Rules 2002, 3017, and 9007 and section 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or required to be given in these cases and copies of all papers served or required to be served, including, but not limited to,

¹ The Involuntary Petition referenced herein names only Cox Operating, LLC; however, out of an abundance of caution, and in light of the motion for joint administration pending before this Court, the Subject Petitioning Creditors file this Notice of Appearance and Request for Notices in both in the case filed by MLCJR, LLC (case no. 23-90324) and the case filed by Cox Operating, L.L.C. (case no. 23-90327).

all notices (including those required by Bankruptcy Rule 2002), reports, pleadings, motions, applications, lists, schedules, statements, Chapter 11 plans, disclosure statements and all other matters arising herein or in any related adversary proceeding, be given and served upon undersigned through service upon each Counsel, at the addresses, telephone, and email addresses set forth below:

Attn: Benjamin W. Kadden
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PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Notices shall not be deemed or construed to be a waiver of any of the rights, including, without limitation, to (i) request that final orders in non-core proceedings be entered only after *de novo* review by a higher court; (ii) demand trial by jury in any proceeding in this case, or any case, controversy, or adversary proceeding related to this case; (iii) request withdrawal of the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Subject Petitioning Creditors may be entitled in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved and not waived.

Respectfully submitted,

LUGENBUHL, WHEATON, PECK,
RANKIN & HUBBARD

/s/ Benjamin W. Kadden
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Attorneys for Subject Petitioning Creditors

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2023, a true and correct copy of the foregoing instrument was filed by operation of this Court's CM/ECF system and served on the following persons via email, including registered to receive electronic notice, as provided below:

- **Rebecca Blake Chaikin** rchaikin@jw.com,
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/s/ Benjamin W. Kadden
Benjamin W. Kadden